

## United States District Court

SOUTHERN

DISTRICT OF

TEXAS

NOV 28 2019

McALLEN DIVISION

UNITED STATES OF AMERICA

V.

David J. Bradley, Clerk

## CRIMINAL COMPLAINT

Juan Angel Mendoza-Briones

Principal

Case Number:

YOB: 1998

Mexico

M-19- 2920 -M

(Name and Address of Defendant)

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about November 26, 2019 in Hidalgo County, in the Southern District of Texas defendants(s) did,  
(Track Statutory Language of Offense)

knowing or in reckless disregard of the fact that Jose Bertilio Garcia-Rivera, a citizen and national of Honduras, and Kevin Alejandro Romero, a citizen and national of El Salvador, along with nine (9) other undocumented aliens, for a total of eleven (11), who had entered the United States in violation of law, concealed, harbored or shielded from detection or attempted to conceal, harbor, or shield from detection such aliens in any place, including any building or means of transportation, to wit: a residence located in Alton, Texas

in violation of Title 8 United States Code, Section(s) 1324(a)(1)(A)(iii) FELONY

I further state that I am a(n) U.S. Border Patrol Agent and that this complaint is based on the following facts:

On November 26, 2019, Border Patrol Agents, along with Hidalgo County Deputies, responded to a suspected stash residence located at 1600 N. Alamo Street in Alton, Texas. At the residence, agents and deputies knocked on the front door and identified themselves as law enforcement. Several minutes later, a male subject, later identified as Juan Angel Mendoza-Briones, opened the front door with his arms up and proceeded to exit the residence. Behind Mendoza followed an additional eleven (11) subjects. All twelve (12) subjects admitted to being illegally present in the United States.

Agents questioned Mendoza who admitted to harboring the undocumented aliens at the residence. Mendoza advised agents that he had full control of the residence. Mendoza was advised of his Miranda Rights and placed under arrest. **SEE ATTACHED**

**I declare under penalty of perjury that the statements in this complaint are true and correct. Executed on November 28, 2019**

Continued on the attached sheet and made a part of this complaint:

☒ Yes ☐ No

*Submitted by reliable means, sworn to and attested telephonically per Fed. R. Cr. P. 4.1, and probable cause found*  
Sworn to before me and subscribed in my presence, *@ 9:30 AM*

/s/ Jon Chan

Signature of Complainant

Jon M. Chan

Border Patrol Agent

Printed Name of Complainant

November 28, 2019

Date

at McAllen, Texas

City and State

J Scott Hacker

, U. S. Magistrate Judge

Name and Title of Judicial Officer

Signature of Judicial Officer

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
McALLEN, TEXAS**

**ATTACHMENT TO CRIMINAL COMPLAINT:**

**M-19- 2920 -M**

**RE:      Juan Angel Mendoza-Briones**

**CONTINUATION:**

All twelve (12) subjects were transported to the Rio Grande Valley Centralized Processing Center (RGV CPC) for processing.

**Principal Sworn Statement:**

Juan Angel Mendoza-Briones, a citizen of Mexico, was advised of his Miranda Rights, stated he understood his Rights, and agreed to provide a sworn statement.

Mendoza indicated that he was hired to harbor illegal aliens at his house and was being paid \$20 per person. Mendoza stated that the aliens were fed three times a day, and claimed they were free to leave the house as they pleased.

**Material Witnesses Statements:**

Jose Bertilio Garcia-Rivera, a citizen of Honduras, and Kevin Alejandro Romero, a citizen of El Salvador, were advised of their Miranda Rights. Garcia and Romero stated they understood their Rights and agreed to provide a sworn statement.

Jose Bertilio Garcia-Rivera claimed that he made all his smuggling arrangements and has paid \$3,500 of the \$7,500 he agreed to pay. Garcia stated that he illegally entered the United States with seven (7) other subjects and they were picked up and transported to a house where they spent a night. The next day they were picked up and transported to the stash house where he was apprehended. Garcia stated that the subject who was living in the house would mistreat them, lock them in a room and would not let them out of the house. Garcia claimed that they were hardly fed and would have to ask permission to use the restroom. Garcia stated that the person living in the house would threaten to beat them up if they did not follow instructions.

Garcia positively identified Juan Angel Mendoza-Briones, through a photo lineup, as the caretaker who was living at the house.

Kevin Alejandro Romero claimed he illegally entered into the United States with seven (7) other subjects. Romero was eventually transported to the house where he was arrested. Romero stated that when he arrived to the house he was patted down by a man who he identified as the caretaker. Romero stated that the caretaker told him which room to enter and instructed him to not walk past the bathroom that was located outside of the room. Romero added that while he was at the house they were barely fed.

ROMERO Garcia positively identified Juan Angel Mendoza-Briones, through a photo lineup, as the caretaker of the house, and as the subject that gave the group instructions.